

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-CR-20336-LEIBOWITZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAYNEO BLANC,

Defendant.

/

**DEFENDANT RAYNEO BLANC'S UNOPPOSED MOTION FOR
CONTINUANCE OF SENTENCING DATE**

The Defendant, RAYNEO BLANC, by and through his undersigned counsel, files this Unopposed Motion for Continuance of the presently scheduled sentencing date. In support of this Motion the Defendant states as follows:

1. Mr. Blanc was charged with a single count of carjacking, in violation of 18 U.S.C. §2119(1).
2. On February 23, 2024 Mr. Blanc pled guilty to Count I of the indictment and immediately began to cooperate with the government relating to the charges still pending against the co-defendants.
3. Mr. Blanc was an essential witness for the government at the trial of the co-defendants which concluded on December 18, 2024 (co-defendants' initial trial resulted in the court ordering a mistrial on June 26, 2024).

4. This Honorable Court has scheduled Mr. Blanc's sentencing for Friday, April 25, 2025.

5. Undersigned counsel has made arrangements to attend a National Association of Criminal Defense Lawyers Seminar in Las Vegas, Nevada which begins April 24, 2025 and concludes on April 26, 2025.

6. The defendant, RAYNEO BLANC, respectfully requests this Court reschedule Mr. Blanc's sentencing date so that he may attend the seminar.

7. Undersigned counsel has conferred with Assistant U.S. Attorney Stefan Diaz Espinosa, opposing counsel, regarding rescheduling the defendant's sentencing. Mr. Diaz Espinosa has advised that he does not oppose a continuance of the sentencing date.

WHEREFORE, based upon the foregoing facts and circumstances, Defendant RAYNEO BLANC respectfully requests this Honorable Court enter an order rescheduling the sentencing date.

Respectfully submitted,

ROY J. KAHN, P.A.
420 S. Dixie Highway, Suite 4B
Coral Gables, FL 33146
Tel: (305) 358-7400
Fax: (305) 358-7222
/s/ *Roy J. Kahn*
ROY J. KAHN
Florida Bar No. 224359
rjk@roykahnlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2ND day of April 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will deliver notices of electronic filing to all counsel of record.

/s/ Roy J. Kahn
ROY J. KAHN